

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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IN RE:

MANUEL VOLCAN aka
MANUEL D. VOLCAN,

CHAPTER 7
Case No. 1-11-42029-jbr

Debtor.

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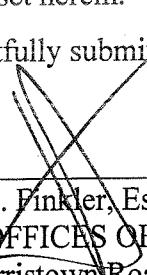
**MOTION TO REOPEN CLOSED BANKRUPTCY CASE ON
BEHALF OF CREDITOR WESTERN UNION FINANCIAL SERVICES, INC.**

Counselors:

PLEASE TAKE NOTICE, that Western Union Financial Services, Inc., a successor in interest to Vigo Remittance Corp., as a creditor of the Debtor, Manuel Volcan aka Manuel D. Volcan, hereby moves this Court on the 16th day of February, 2012, at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York, for an Order pursuant to 11 U.S.C. section 350(b) and Bankruptcy Rule 5010, to reopen this closed bankruptcy case in order to file an adversary complaint pursuant to 11 U.S.C. 523(a)(3) that the debt owed to Western Union was not discharged, along with such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to local Bankruptcy Rule 9006-1 all answering affidavits and briefs, if any, must be served and received by counsel to the creditor at least seven (7) days prior to the hearing date set herein.

Respectfully submitted,



David J. Finkler, Esq. (df9320)
LAW OFFICES OF DAVID J. FINKLER, P.C.
266 Harristown Road, Suite 203
Glen Rock, N.J. 07452
(201) 689-0001
Attorneys for Western Union Financial Services, Inc.

To: Manuel Volcan
143-09 85 Drive
Briarwood, N.Y. 11435
Debtor

Manuel Gomez, Esq.
225 Broadway, Suite 1010
New York, N.Y. 10007
Attorney for Debtor

David Doyaga, Esq.
Chapter 7 Trustee (Discharged)
26 Court Street, Suite 1002
Brooklyn, N.Y. 11242